

memorandum

Rocky Flats Office

DATE: MAY 29 1992

REPLY TO
ATTN OF: ERD:BKT:6036

SUBJECT: Notice of Violation (No. 92-05-22-01) for the Draft Final Phase I RFI/RI Work Plan for Operable Unit No. 8

TO: J. M. Kersh, Associate General Manager
Environmental and Waste Management
EG&G Rocky Flats, Inc.

Please find enclosed a letter from CDH, dated May 22, 1992, regarding a Notice of Violation (No. 92-05-22-01) under the IAG and Colorado Hazardous Waste Act for the Draft Final Phase I RFI/RI Work Plan for OU 8. This document was transmitted to EPA and CDH on May 1, 1992.

We request that the deficiencies identified in the CDH letter be reviewed and the Draft Final RFI/RI Work Plan for OU 8 revised accordingly. In addition, we request that the deficiencies identified in DOE transmittal letter 92-DOE-4893 (also enclosed) be reviewed and comments presented by DOE/RFO/ERD on April 23, 1992 be revisited and the Draft Final Work Plan revised per these deficiencies and comments. Also find enclosed EM-453 comments on the preliminary Draft Work Plan which were received by DOE/RFO on May 13, 1992 (too late for inclusion in the document submitted to EPA and CDH). The revised Draft Final Work Plan should be revised per these comments as well. We request that the revised Draft Final Work Plan and responses to written comments and deficiencies be submitted to DOE/RFO/ERD by June 12, 1992, so that the requested revisions can be verified prior to submitting the document to CDH and EPA. Note that CDH has stated that the revised Draft Final Work Plan should be submitted no later than June 22, 1992.

With regard to contract procurement difficulties experienced for the OU 8 Work Plan, we request that you submit a detailed account of the planning, scheduling and procurement process and specific difficulties encountered to DOE/RFO by June 15, 1992. This should include a listing of items where DOE can assist you in solving contract procurement problems. Note that DOE RFO memoranda ERD:HDR:0480, ERD:FRL:9119 and ERD:FRL:3845 transmitted to EG&G on January 23, 1991, October 24, 1991, and April 1, 1992, requested that EG&G solve its contract procurement problems.

ADMIN RECORD

A-DU08-000031

Although it played a much less significant role relative to procurement, the RFEDS needs to be configured to allow electronic cross-referencing with the validated RFP database. This issue was raised at the April 16, 1992 OU 8 scoping meeting with EPA and CDH. Knowledge of validated versus unvalidated data is critical at the RFI/RI scoping stage since this is where data gaps must be identified for developing data quality objectives (DQOs) and the Field Sampling Plan. Note that DOE/RFO memoranda ERD:SG:2134 and ERD:SG:3042 transmitted to EG&G on March 29 and April 22, 1991, requested that EG&G resolve problems with RFEDS. ✓

Questions or concerns regarding this memorandum and enclosures should be directed to Bruce Thatcher of my staff at extension 3532.


James K. Hartman
Assistant Manager
for Environmental Management

Attachments .

cc w/Attachments:
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